

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

THE MUNICIPALITY OF SAN JUAN,  
PUERTO RICO,

Plaintiff,

v.

EXXON MOBIL CORP., SHELL PLC F.K.A.  
ROYAL DUTCH SHELL PLC, CHEVRON  
CORP, BP PLC, CONOCOPHILLIPS, MO-  
TIVA ENTERPRISES LLC,  
OCCIDENTAL PETROLEUM F.K.A. ANA-  
DARKO PETROLEUM CORP, BHP, ARCH  
RESOURCES INC. F.K.A. ARCH COAL  
COMPANY, RIO TINTO PLC, PEABODY  
ENERGY, XYZ CORPORATIONS 1-100,  
and JOHN AND JANE DOES 1-100,

Defendants.

Civil Case No. 3:23-cv-01608

Re:

Consumer Fraud; Deceptive Business Prac-  
tices; Racketeer and Corrupt Organizations  
Act, 18 U.S.C. § 1962; Sherman Act, 15  
U.S.C. § 1 et seq.; Public Nuisance; Strict  
Liability – Failure to Warn; Strict Liability –  
Design Defect; Negligent Design Defect;  
Private Nuisance; Unjust Enrichment

**DOMESTIC DEFENDANTS’ MOTION SUBMITTING CERTIFIED TRANSLATION**

TO THE HONORABLE COURT:

COME NOW Defendants Occidental Petroleum Corporation, Exxon Mobil Corp., Chevron Corp., ConocoPhillips, and Motiva Enterprises LLC (collectively, the “Domestic Defendants”), by and through their respective undersigned counsel, and respectfully submit the certified English translation of Article 2.016 of the Puerto Rico Municipal Code, 21 L.P.R.A. § 7181, which is cited in their Joint Reply in Support of their Motion to Dismiss for Failure to State a Claim (Dkt. No. 213). An official English translation of said Article is not publicly available.

WHEREFORE, the Domestic Defendants respectfully request that the Honorable Court take notice of the foregoing and of the certified translation submitted herewith.

RESPECTFULLY SUBMITTED

CERTIFICATE OF SERVICE: I, Roberto C. Quiñones-Rivera, hereby certify that, on this same date, I filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys and participants of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of May 2025.

By: /s/ Roberto C. Quiñones-Rivera

Roberto C. Quiñones-Rivera  
USDC-PR Bar No. 211512  
Eduardo A. Zayas-Marxuach  
USDC-PR Bar No. 216112  
Myrgia M. Palacios-Cabrera  
USDC-PR Bar No. 230807  
MCCONNELL VALDÉS LLC  
P.O. Box 364225  
San Juan, PR 00936-4225  
Telephone: 787-250-2631  
Facsimile: 787-474-9201  
Email: rcq@mcvpr.com

Theodore J. Boutrous, Jr. (*pro hac vice*)  
William E. Thomson (*pro hac vice*)  
Joshua D. Dick (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: (213) 229-7000  
Email: tboutrous@gibsondunn.com  
Email: wthomson@gibsondunn.com  
Email: jdick@gibsondunn.com

Thomas G. Hungar (*pro hac vice* forthcoming)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue NW  
Washington, D.C. 20036  
Telephone: (202) 887-3784  
Email: thungar@gibsondunn.com

Neal S. Manne (*pro hac vice* forthcoming)  
Erica Harris (*pro hac vice* forthcoming)  
SUSMAN GODFREY LLP  
1000 Louisiana, Suite 5100  
Houston, TX 77002  
Telephone: 713.651.9366  
Facsimile: 713.654.6666  
Email: nmanne@susmangodfrey.com  
Email: eharris@susmangodfrey.com

*Attorneys for Defendant CHEVRON CORPORATION*

By: /s/Ricardo F. Casellas Sánchez  
Ricardo F. Casellas Sánchez  
USDC-PR No. 203114  
Heriberto J. Burgos-Pérez  
USDC-PR No. 204809  
CASELLAS ALCOVER & BURGOS, P.S.C.  
2 Tabonuco Street, Suite 400  
San Patricio, Puerto Rico 00968  
Telephone: (787) 756-1400  
Facsimile: (787) 756-1401  
Email: rcasellas@cabprlaw.com  
Email: hburgos@cabprlaw.com

Matthew T. Martens (*pro hac vice*)  
Ericka Aiken (*pro hac vice*)  
WILMER CUTLER PICKERING HALE  
AND DORR LLP  
2100 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363  
Email: matthew.martens@wilmerhale.com  
Email: ericka.aiken@wilmerhale.com

Hallie B. Levin (*pro hac vice*)  
WILMER CUTLER PICKERING HALE  
AND DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363  
Email: hallie.levin@wilmerhale.com

Robert Kingsley Smith (*pro hac vice*)  
WILMER CUTLER PICKERING HALE  
AND DORR LLP  
60 State Street  
Boston, MA 02109  
Telephone: (617) 526-6000  
Facsimile: (617) 526-5000  
Email: robert.smith@wilmerhale.com

*Attorneys for Defendant CONOCOPHILLIPS*

By: /s/ Néstor M. Méndez Gómez  
Néstor M. Méndez Gómez  
USDC-PR Bar No. 118409  
María D. Trelles Hernández  
USDC-PR Bar No. 225106  
PIETRANTONI MENDEZ & ALVAREZ LLC  
Popular Center, 19th Floor  
208 Ponce de León Ave.  
San Juan, Puerto Rico 00918  
Telephone: (787) 274-1212  
Facsimile: (787) 274-1470  
Email: nmendez@pmalaw.com  
Email: mtrelles@pmalaw.com

Theodore V. Wells, Jr. (*pro hac vice*)  
Daniel J. Toal (*pro hac vice*)  
Yahonnes Cleary (*pro hac vice*)  
Caitlin E. Grusauskas (*pro hac vice*)  
PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP  
1285 Avenue of the Americas  
New York, New York 10019-6064  
Telephone: (212) 373-3000  
Facsimile: (212) 757-3990  
Email: twells@paulweiss.com  
Email: dtoal@paulweiss.com  
Email: ycleary@paulweiss.com  
Email: cgrusauskas@paulweiss.com

*Attorneys for Defendant EXXON MOBIL  
CORPORATION*

By: /s/ Kenneth C. Suria

Kenneth C. Suria  
USDC-PR Bar No. 213302  
ESTRELLA, LLC  
P.O. Box 9023596  
San Juan, Puerto Rico 00902-3596  
Telephone: (787) 977-5050  
Facsimile: (787) 977-5090  
Email: kcsuria@estrellallc.com

Tracie J. Renfroe (*pro hac vice*)  
KING & SPALDING LLP  
1100 Louisiana, Suite 4100  
Houston, TX 77002  
Telephone: (713) 751-3200  
Facsimile: (713) 751-3290  
Email: trenfroe@kslaw.com

Oliver Thoma (*pro hac vice*)  
West, Webb, Allbritton & Gentry, P.C.  
1515 Emerald Plaza • College Station, Texas 77845  
Telephone: (979) 694-7000  
Facsimile: (979) 694-8000  
Email: oliver.thoma@westwebblaw.com

*Attorneys for Defendant MOTIVA ENTERPRISES LLC*

By: /s/ David Indiano

David Indiano  
USDC-PR Bar No. 200601  
Jeffrey M. Williams  
USDC-PR Bar No. 202104  
INDIANO & WILLIAMS, P.S.C.  
207 del Parque Street; 3rd Floor  
San Juan, P.R. 00912

Duke K. McCall, III (*pro hac vice*)  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Ave, NW  
Washington D.C., 20004

*Attorneys for Defendant OCCIDENTAL PETROLEUM CORPORATION*